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7 ***UNITED STATES DISTRICT COURT***
8 ***NORTHERN DISTRICT OF CALIFORNIA***
9 ***SAN JOSE DIVISION***
10

11 UNITED STATES OF AMERICA,

12 Case No. **CR 16-00211 LHK**

13 Plaintiff,

14 vs.

15 VILASNI GANESH et al.,

16 Defendants.
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19 _____ /

20 **DEFENSE DISCLOSURE OF WITNESSES (Ganesh)**
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22 **1. Jackie Daniels**

23 Jackie Daniels has worked for Dr. Gregory Belcher as a medical assistant since 2011.
24 She still works for him. She has known Dr. Ganesh since 2011 as well. Dr. Ganesh had Jackie
25 fired at one point even though Daniels was Dr. Belcher's employee. Dr. Belcher later rehired her.
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1 She really does not like Dr. Ganesh. Daniels will characterize Dr. Ganesh since knowing her as
2 crazy and unprofessional. She will testify that Dr. Ganesh's behavior has not changed or
3 improved since 2011.

4 Examples:

5 · Dr. Ganesh is always late to her patient appointments, often 2-3 hours late. Dr. Ganesh
6 would even show up wearing gym clothes and looking disheveled, and the staff would have to
7 help her clean up her look before seeing patients. Dr. Ganesh would also talk about too many
8 personal things with her patients and talk too much about unrelated matters. Daniels rarely heard
9 the patients talking.

10 · Daniels will state that she thinks there's something seriously wrong with Dr. Ganesh and
11 that she is "a big mess all the time". Testimony will include the fact that Dr. Ganesh would
12 argue with Dr. Belcher in front of his patients, constantly yelling at him about insignificant
13 things. He would try to calm her down and tell her this is not the right place or time, but she
14 would not listen. Daniels will describe Dr. Ganesh as having "no brakes".

15 · Daniels will testify regarding some of the factual basis' of other witnesses anticipated
16 testimony. She will establish that this are long existing characteristics which interfered with her
17 ability to function and earn money. She will describe how Dr. Ganesh was unable to understand
18 many critical concepts that a typical physician running a medical practice would probably know.
19 Very specifically, she will state that nearly everyone in the staff, including Daniels attempted to
20 explain to Dr. Ganesh how basic insurance deductibles worked. She will describe how Dr.
21 Ganesh had her personal, irrational and incorrect belief that patients do not have to pay
22 deductibles. Despite the name "deductible" and the basic concepts concerning deductibles, she
23 was obsessively convinced that insurance companies had to pay, regardless of the policy terms
24 regarding deductibles. Daniels will testify that she tried to explain that certain insurance
25 companies had deductibles that were not met, and therefore, would not pay. In other words, the
26 patients would have to pay. Dr. Ganesh, however, refused to charge her patients because she

1 insisted that insurance companies should pay for everything. She was strangely obsessed &
2 fixated on the insurance companies having all the money and conspiring not to pay her for her
3 work.

4 Daniels will describe Dr. Ganesh as a physician. She will confirm observations that you
5 will hear from Dr. Levinson that Dr. Ganesh was good with single tasks, e.g diagnosing her
6 patients for certain things but not for any complex reasoning. Daniels will testify that it has
7 always been impossible to reason with Dr. Ganesh. Dr. Ganesh is very combative and fights with
8 everyone.

9 10 **2. Donsia Strong**

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12 Donsia Strong is an attorney. She will testify about Vilasni's literally insane type behavior dating
13 back to 2013-2014. She will describe how the Ganesh/Belcher family was supposed to be going
14 on vacation together. But instead, Dr. Ganesh flew to Oceanside on Christmas Eve to call the
15 police on Donsia and her family. Donsia was living in a home owned by Ganesh/Belcher that
16 was near the naval base. They had leased it to Donsia Strong and she was regularly paying rent
17 (via electronic payments) and had spent considerable money (on her own and outside any
18 contractual obligation), to fix the property.

19 The police arrived at the house and Dr. Ganesh claimed that Ms. Strong and her husband
20 were. The police spoke to Greg Belcher and left the scene without making an arrest.

21 Ms. Strong will describe how this incident was just one of many episodes. Dr. Ganesh harassed
22 her and her family through texts, emails, and eviction notices. (I will attach two of them) Dr.
23 Ganesh appeared to have hired a lawyer and real estate agents to try and evict Ms. Strong.
24 Despite showing Vilasni that Donsia was paying rent and had actually spent her own money to
25 make improvements on the house, Vilasni becoming irrationally obsessed with her delusion that
26 Donsia Strong "was ripping her off".

1 **3. Venkat Ganesan**

2 Venkat is the brother of Dr. Ganesh and has been her assistant throughout her life. By
3 this we mean he will describe how Dr. Ganesh has always had the impairments that Dr.
4 Levinson, Dr. Friedman and others will describe. He will relate how Dr. Ganesh failed as a
5 parent in that she is and was unable to care for her children, care for ordinary day to day activities
6 and that her impairments were compensated for by reliance on others.

7 Venkat will describe her emotional outbursts, her inability to understand basic concepts
8 of her practice, business, and her inability to follow basic advice or instructions. He will relate
9 how she has long prior to the criminal charges in this case, had fantasy type beliefs of conspiracy
10 by insurance companies, contractors and others against her. He will describe in great detail,
11 specific family events as examples of self destructive behaviors that are of the type and character
12 that Dr. Levinson describes. In other words, he will provide historical proof that the mental
13 problems predated any criminal charges.

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15 **4. Ram Mayala**

16 Ram is Dr. Ganesh's 20-year old son from her first marriage. He is currently a student at
17 UC Santa Barbara.

18 Ram will provide historical information documenting the fact that his mother has
19 genuine, long standing mental illness and that her current problems are not feigned for purposes
20 of providing a defense in this case. He will do this not by opinion as to the current case but in
21 reliance upon specific factual information including but not limited to the following:

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23 1. He will testify that his mother gets "stressed out a lot" and when she does she is unable
24 to think clearly. Stressors include work, the construction on the house, and the trial. Once his
25 mom becomes stressed, she stops listening to people and repeats the same thing over and over.
26 When she's in this frame of mind, she cannot apply logic. He will relate to the stress reaction

1 including erupting with energy, sounding irrational and being unable to think or communicate in
2 any logical manner.

3 He will testify that this is not a recent development and that she has been this way as long
4 as he can remember. He will describe this stress as constant and he will be unable to indicate any
5 time that this “stress” was not present. Please be aware that our experts will relate this “stress”
6 more broadly - to core impairments.

7
8 Ram will address how his mother can read books and remember their contents but
9 struggles to apply logic. He will testify that she does not think in a step by step manner. He will
10 describe her thinking as a “unique mind” and will state that throughout life she has had an
11 excellent book memory e.g. for organic chemistry, but becomes flustered when she has to deal
12 with logic or math. His testimony will mirror the testing and testimony of the treating experts.

13 Ram will state that his mother does not think there is anything wrong with herself. In
14 terms of Dr. Glezer’s testimony and in support of the defense theories, he will relate facts that
15 include:

16 1. On an typical day, Dr. Ganesh will wake up around 11 in the morning.

17 2. Growing up, he and his younger brother had to be proactive and do everything. For example,
18 if they needed a permission slip signed, they would have to compete every step aside from having
19 her sign it and bring it to her to sign at that exact moment. Otherwise, she would forget
20 completely and not do it.

21 3. As a parent, she was incapable of staying on task and needed everything laid out for
22 her. He said she is not task-oriented.

23 4. His mom often insults Dr. Belcher calling him names like “idiot” and “loser”.

24 5. The children in the household kids do not respond well to his mom. She has no control over
25 them.
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1 6. His mom is often unable to process what is going on. For example, when he was
2 young, they went to a bookstore and she could not understand a promotion that was being
3 offered. She kept asking the store clerk why she did not get her “discount”. She was fixated on
4 the discount and could not understand that the promotion was essentially the discount. She left
5 the store unable to understand even though her 10-year old son (Ram) understood. Ram tried
6 explaining it to her at the time and was unsuccessful.

7 7. She is verbally combative when she believes she has been wronged and her perception
8 of being “wronged” is irrational.

9 8. She sees things in grandiose terms only.

10 9. There has always been a sense of instability with his mom.

11 10. Ram will describe how he and his younger brother spent an entire summer in Fremont
12 at their grandma’s house when they were young. At the end of the summer, they did not want to
13 return home with their mom because she was stressed out. She realized she had no control over
14 the kids, freaked out and called the police on her kids and mother simply because she had no
15 control over the situation.

16 11. Ram will support the testimony of Venkat Ganeshen as he recalls Venkat telling his mother
17 that she should see a psychiatrist or at least a family therapist and she took offense to it.
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20 5. **Lori Landis:** Former biller employed by Ganesh who will testify to her experience
21 working with Ganesh.

22 6. **Cynthia Jamison:** Former biller employed by Ganesh who will testify to her
23 experience working with Ganesh.

24 7. **Robert Bustamonte, Attorney**

1 Attorney Bustamonte represented Dr. Ganesh in lawsuits against contractors. He will
2 describe how she had valid cases but destroyed them by behavior that was irrational, delusional
3 and accusatory. He will relate mental defects and emotional defects that interfered with her case.
4 These defects, behaviors, bizarre perceptions include a belief that her prior attorneys were part of
5 the conspiracy with the District Attorney and Sheriff and the contractors. His descriptions will
6 mirror the beliefs and conduct reflected in the medical reports in this case (e.g. Dr. Levinson) and in
7 the behaviors that the witnesses will describe. Attorney Bustamonte will place the aberrant behavior
8 in a context where it was counter productive to Dr. Ganesh' immediate personal, financial and legal
9 interests.

10 **8. Nagalakshmi Ganesan**

11 This is Dr. Ganesh' mother. She will describe difficulties in childbirth and childhood
12 neurological impairments. This was referenced in Dr. Levinson's testimony. She will describe Dr.
13 Ganesh as having impairments in thought, perception and learning throughout childhood and how
14 she was excellent at memorization and in relying upon other people to fill the gaps in her abilities.

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18 Daniel Horowitz
19 Attorney for Vilasni Ganesh
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